

**JAMES KOUSOUROS**  
ATTORNEY AT LAW

260 Madison Avenue, 22nd floor • New York, NY 10016  
212•532•1934 / 212•532•1939 fax  
E-mail: [James@kousouroslaw.com](mailto:James@kousouroslaw.com)

JAMES KOUSOUROS  
FOUNDER & PRINCIPAL

EMMA J. COLE  
LEGAL ASSISTANT

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 1/17/2024

**MEMORANDUM ENDORSED**

January 17, 2025

By ECF

The Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Gannon Bond*, 24 Cr. 091 (GHW)**

Dear Judge Woods:

This letter is respectfully submitted to request that the Court temporarily modify the conditions of Mr. Bond's release to permit him to travel to Portland, Oregon from January 23, 2025, through January 27, 2025, in order to visit his mother. As the Court may recall, Mr. Bond's mother lives in Oregon and posted her property to secure his appearance bond. The address has been provided to Pretrial Services and the Government.

Pretrial Services and the Government have no objection to this request provided Mr. Bond provide his flight itinerary in advance of departure.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros  
James Kousouros, Esq.  
*Counsel for Mr. Bond*


Cc. All Counsel of Record (By ECF)

Kristen McKeown  
Senior U.S. PTS Officer

Jazzlyn A. Harris  
U.S. PTS Officer Assistant

Application granted. The conditions of the defendant's pretrial release are modified as follows: the defendant may travel to Portland, Oregon from January 23, 2025 through January 27, 2025. The defendant must provide the pretrial services officer a copy of his itinerary. All other conditions of the defendant's pretrial release remain in full force and effect. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 104.

SO ORDERED.  
Dated: January 17, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge